

1 Andrew H. Pastwick, ESQ.
2 Nevada Bar No. 009146
3 LAW OFFICE OF ANDREW H. PASTWICK L.L.C.
4 1810 E. Sahara Avenue, Suite 120
5 Las Vegas, Nevada 89104
6 Tel: (702) 866-9978
7 Fax: (702) 369-1290
8 E-mail: apastwick@pastwicklaw.com
9 Attorney for Defendant
10 Your First Choice, LLC d/b/a
11 First Choice Payday Loan

12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**UNITED STATE DISTRICT COURT
DISTRICT OF NEVADA**

11 IRMA RODRIGUEZ,)
12) Civil Action No.: 2:16-cv-02447
13 Plaintiff,)
14)
15 v.)
16)
17 YOUR FIRST CHOICE, LLC D/B/A)
18 FIRST CHOICE PAYDAY LOAN;)
19)
20 Defendants.)
21)
22)
23)
24)
25)
26)
27)
28)

19
20
21
22
23
24
25
26
27
28

**DEFENDANT YOUR FIRST CHOICE, LLC D/BA FIRST CHOICE
PAYDAY LOAN'S PROPOSED VOIR DIRE QUESTIONS**

21
22
23
24
25
26
27
28

DATE OF TRIAL: April 23, 2018

TIME OF TRIAL: 9:00 a.m.

23 COMES NOW Defendant YOUR FIRST CHOICE, LLC D/B/A FIRST
24 CHOICE PAYDAY LOAN, by and through the Law Office of Andrew H.
25 Pastwick, LLC, hereby files Defendant's Proposed Voir Dire Questions:
26
27
28

DEFENDANT'S REQUESTED VOIR DIRE
QUESTION NUMBER 1

Have you ever obtained a payday loan, and if so,

- (a) whether you paid it back
- (b) where you sued as a result of the payday loan

DEFENDANT'S REQUESTED VOIR DIRE
QUESTION NUMBER 2

Have you ever been contacted by a debt collector; and if so,

- (a) was it for a pay-day loan
- (b) did the debt collector contact you by telephone and/or in person
- (c) did you consider the debt collector's behavior to be harassing or abusive.

DEFENDANT'S REQUESTED VOIR DIRE
QUESTION NUMBER 3

Have you ever obtained a loan from someone other than a family member; and if so,

- (a) Did you repay the loan
- (b) Where you contacted by a debt collector as a result of this loan.
- (c) Did this loan result in litigation against you

DEFENDANT'S REQUESTED VOIR DIRE
QUESTION NUMBER 4

Do you have any negative thoughts about businesses that make payday loans that would influence your judgment in this dispute?

DEFENDANT'S REQUESTED VOIR DIRE
QUESTION NUMBER 5

Are you or have you ever owned your own business

DEFENDANT'S REQUESTED VOIR DIRE
QUESTION NUMBER 6

Have you ever loaned money to a person that was not a family member, and if so,

- a. Did they pay you back.
- b. How did you feel about the person not paying you back
- c. What collection efforts did you pursue

DEFENDANT'S REQUESTED VOIR DIRE
QUESTION NUMBER 7

Do you believe that people who borrow money from a payday loan center should be responsible for paying the loan back?

DEFENDANT'S REQUESTED VOIR DIRE
QUESTION NUMBER 8

Do you believe that people who borrow money from a business should be allowed to avoid paying the loan back to the business?

DEFENDANT'S REQUESTED VOIR DIRE

QUESTION NUMBER 9

Do you own stock or bonds in a publicly traded corporation?

DEFENDANT'S REQUESTED VOIR DIRE
QUESTION NUMBER 10

Have you been lost a property as a result of a foreclosure action?

DEFENDANT'S REQUESTED VOIR DIRE
QUESTION NUMBER 11

Do you currently own or rent your own house?

DEFENDANT'S REQUESTED VOIR DIRE
QUESTION NUMBER 12

Do you own any properties that you are currently renting out to third-parties that are not immediate family members?

DEFENDANT'S REQUESTED VOIR DIRE
QUESTION NUMBER 13

Have you filed for bankruptcy within the past ten (10) years?

DEFENDANT'S REQUESTED VOIR DIRE
QUESTION NUMBER 14

Have you ever had an automobile repossessed?

DEFENDANT'S REQUESTED VOIR DIRE
QUESTION NUMBER 15

Have you ever worked for a small business?

DEFENDANT'S REQUESTED VOIR DIRE
QUESTION NUMBER 16

If you were my client, would you be completely comfortable having you as a

1 juror on this case?

2 **DEFENDANT'S REQUESTED VOIR DIRE**
3 **QUESTION NUMBER 17**

4 Can you think of anything in your own life that reminds you of this
5 case? What and how?

6 **DEFENDANT'S REQUESTED VOIR DIRE**
7 **QUESTION NUMBER 18**

8 Is there anything that you have seen or heard that would make it hard for you
9 to guarantee to judge my client the same as the other side?

10 **DEFENDANT'S REQUESTED VOIR DIRE**
11 **QUESTION NUMBER 19**

12 Is there anything you would prefer to discuss in private?

13 **DEFENDANT'S REQUESTED VOIR DIRE**
14 **QUESTION NUMBER 20**

15 Is there anything we haven't asked you that you think we should know?

16 DATED this 16th day of April, 2018

17 LAW OFFICE OF ANDREW H. PASTWICK
18 L.L.C.

19 By: /S/ Andrew H. Pastwick

20 Andrew H. Pastwick, Esq.

21 Nevada Bar No. 009146

22 1810 E. Sahara Avenue, Suite 120

23 Las Vegas, Nevada 89104

24 (702) 866-9978

25 Attorney for Defendant Your First Choice

26 d/b/a First Choice Payday Loan
27
28

CERTIFICATE OF SERVICE

Pursuant to F.R.C.P. 5(b), I certify that I am an employee of the Law Office of Andrew H. Pastwick, and not a party to, nor interest in, the within action, that on April 16th, 2018, a true and correct copy of the foregoing DEFENDANT YOUR FIRST CHOICE, LLC D/BA FIRST CHOICE PAYDAY LOAN'S PROPOSED VOIR DIRE QUESTIONS served via pacer to:

David H. Krieger, Esq.
Haines & Krieger, LLC
8985 S. Eastern Avenue, Suite 350
Henderson, Nevada 89123

Matthew I. Kneppper
Knepper & Clark, LLC
10040 W. Cheyenne Ave, Suite 170-109
Las Vegas, Nevada 89129

/S/ Andrew H. Pastwick
An Employee of Law Office of Andrew H. Pastwick L.L.C.